U.S. Department of Justice

United States Attorney
Southern District of New York

MEMO ENDORSED

86 Chambers Street
New York, New York 10007

July 8, 2021

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By ECF
Hon. Valerie Caproni
United States District Judge
United States District Court, Southern District of New York
40 Foley Square
New York, New York 10007

      Re: *Saleh Almareh v. Chad Wolf, et al.*, No. 20 Civ. 11024 (VEC)

Dear Judge Caproni:

      This Office represents the government in the above-captioned action in which Petitioner challenges the denial of his Application for Naturalization (Form N-400) filed with U.S. Citizenship and Immigration Services. I write on behalf of both sides to respectfully request that the initial pre-trial conference in this matter scheduled for July 23, 2021, and the associated July 15, 2021 deadline for the joint letter and proposed case management plan, be adjourned *sine die* in light of the government's anticipated filing of a motion to dismiss. The government intends to move to dismiss on the ground that, among other things, this Court lacks subject matter jurisdiction over the petition. As provided in the parties' proposed briefing schedule, which was so-ordered by the Court yesterday, the government will file its motion on or before July 23, 2021. *See* ECF No. 17.

      This is the first request to adjourn the initial pre-trial conference in this case, and, as noted, Petitioner joins in this request.

      I thank the Court for its consideration of this request.

Application GRANTED. The July 23, 2021 IPTC is ADJOURNED *sine die,* and discovery in this case is stayed, pending the Court's decision on Defendants' forthcoming motion to dismiss.

SO ORDERED.

[signature: Valerie Caproni]

7/9/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully,

AUDREY STRAUSS
United States Attorney
Southern District of New York

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cc: Mohammad Sawaeer, Esq. (via ECF)